

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

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**SHAUNTERIA FLOWERS,**

**Plaintiff,**

**vs.**

**CAUSE NO. 4:24-cv-008-DMB-DAS**

**GREENWOOD LEFLORE  
CONSOLIDATED SCHOOL  
DISTRICT, MISSISSIPPI; SAMANTHA  
MILTON, IN HER OFFICIAL AND  
INDIVIDUAL CAPACITIES, ET.  
ALABAMA.,**

**Defendants.**

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**GREENWOOD LEFLORE CONSOLIDATED SCHOOL DISTRICT AND  
SAMANTHA MILTON’S ANSWER TO COMPLAINT**

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Defendants, Greenwood Leflore Consolidated School District and Samantha Milton, in her Official and Individual Capacities, (“Defendants”), through counsel and pursuant to Rules 8 and 12 of the Federal Rules of Civil Procedure, respond to the Complaint filed by Plaintiff, Shaunteria Flowers (“Plaintiff”), and state as follows:

**FIRST DEFENSE**

Plaintiff’s Complaint fails to state a claim upon which relief can be granted against Defendants and should, therefore, be dismissed pursuant to Rules 12(b)(6) *of the Federal Rules of Civil Procedure*.

**SECOND DEFENSE**

For answer to the separately numbered paragraphs of Plaintiff’s Complaint, Defendants state as follows:

1. Denied.

2. No response is required from these Defendants as it relates to the statements contained in Paragraph 2; however to the extent a response is required, Defendants deny same.

3. Denied.

4. Admitted.

5. Admitted upon information and belief.

6. Defendants admit that Greenwood Consolidated School District is a political subdivision of the state of Mississippi and that the District may be served with process upon Superintendent James Johnson-Waldington. Defendants deny the remaining allegations contained in Paragraph 6 of the Complaint.

7. Admitted.

8. Denied as stated.

9. Defendants admit that Plaintiff testified in a grievance hearing against the Board President, Mrs. Samantha Milton. Defendants deny the remaining allegations in Paragraph 9.

10. Admitted.

11. Denied.

12. Admitted.

13. Admitted.

14. Admitted upon information and belief.

15. Defendants are without sufficient knowledge to either admit or deny the allegations in Paragraph 15, and therefore, denies same.

16. Defendants admit that the School Board denied the superintendent's recommendation of Plaintiff being renamed the Executive Assistant to the Superintendent/Board

of Trustees for the 2022-2023 school year. Defendants deny the remaining allegations in Paragraph 16.

17. Defendants admit that the School Board denied the superintendent's recommendation of Plaintiff being renamed the Executive Assistant to the Superintendent/Board of Trustees for the 2022-2023 school year. Defendants deny the remaining allegations in Paragraph 17.

18. Admitted.

19. Denied.

20. No allegations were contained in Paragraph 20.

21. Defendants admit that Plaintiff's Discrimination Charge for retaliation was submitted to the Equal Employment Opportunity Commission (EEOC) on or about April 4, 2022. Defendants deny the Plaintiff submitted any charge related to racial discrimination.

22. Admitted.

23. Admitted.

24. Denied as Plaintiff did not submit a charge for racial discrimination to the EEOC.

25. Defendants incorporates and restates by reference herein its responses to all previous paragraphs of the Complaint.

26. Denied.

27. Denied.

28. Denied.

29. Denied.

30. Denied.

31. Defendants incorporates and restates by reference herein its responses to all

previous paragraphs of the Complaint.

32. Denied.

33. Denied.

34. Defendants incorporates and restates by reference herein its responses to all previous paragraphs of the Complaint.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. Defendants deny that Plaintiff is entitled to any relief prayed for in the Prayer for Relief including subparts (A) through (E).

41. Defendant denies all allegations and requests for relief not heretofore admitted or denied, and further denies that Plaintiffs are entitled to any relief whatsoever against it.

### **THIRD DEFENSE**

Any and all allegations and requests for relief not heretofore admitted or denied are denied, and Defendants further deny that Plaintiff is entitled to any relief whatsoever against them.

### **FOURTH DEFENSE**

Defendants deny that Plaintiff is entitled to recover in the manner and form of the prayer of the Plaintiff's Complaint or in any other manner or form to recover from Defendants any amounts whatsoever.

**FIFTH DEFENSE**

Plaintiff fails to establish all of the necessary elements of each of her claims for relief, and they, therefore, fail.

**SIXTH DEFENSE**

Any decision made by Defendants with respect to Plaintiff's employment was based upon non-discriminatory factors.

**SEVENTH DEFENSE**

Any decision made by Defendants with respect to Plaintiff's employment was based upon non-discriminatory factors; no causal connection exists between Plaintiff testifying at a grievance hearing and Defendants' employment decisions.

**EIGHTH DEFENSE**

Any actions regarding Plaintiff's employment were neither willful nor wanton, were made without malice or reckless disregard for any protected rights and were consistent with nondiscriminatory factors.

**NINTH DEFENSE**

Defendants assert all rights, remedies, immunities, and defenses available to it pursuant to 42 U.S.C. § 1983.

**TENTH DEFENSE**

Defendants assert that Plaintiff failed to exhaust administrative procedures as it relates to any claim for racial discrimination.

**ELEVENTH DEFENSE**

Defendants assert all affirmative defenses provided under Rules 8(c) and 12(b) of the *Federal Rules of Civil Procedure*, where applicable.

**TWELFTH DEFENSE**

Defendants assert that this action is frivolous, unreasonable, and groundless, and accordingly, Defendants are entitled to sanctions, attorney's fees and other costs associated with the defense of this action.

**THIRTEENTH DEFENSE**

Defendants deny applicability of and/or liability under the *Monell* Doctrine.

**FOURTEENTH DEFENSE**

Defendants reserve the right to amend its Answer and Affirmative Defenses after investigation, discovery, and further information is disclosed to Defendants to enable them to properly answer Plaintiff's Complaint and defend the claims asserted herein against them.

WHEREFORE PREMISES CONSIDERED, Defendants respectfully request that this Court dismiss Plaintiff's Complaint.

Respectfully submitted this, the 24th day of May, 2024.

/s/ Candice C. Hargett  
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Milton*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the foregoing document was electronically filed through the Court's ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Brandi R. Hamilton  
5171 Ebenezer Coxburg Road  
Lexington, Mississippi 39095  
Attorney for Shaunteria Flowers

This the 24th day of May, 2024.

/s/ Candice C. Hargett  
CANDICE C. HARGETT